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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

05-AMRC-0452

OCT 11 2005

Mr. R. G. Gallagher, President
and Chief Executive Officer
Fluor Hanford, Inc.
Richland, Washington 99352

RECEIVED
OCT 27 2005
EDMC

Dear Mr. Gallagher:

CONTRACT NO. DE-AC06-96RL13200 - TRANSMITTAL OF SURVEILLANCE OF STATE
WASTE DISCHARGE PERMIT ST-4501, HANFORD SITE, 400 AREA FAST FLUX TEST
FACILITY (FFTF)

Enclosed please find the RL "Surveillance of State Waste Discharge Permit ST-4501, Hanford Site, 400 Area FFTF." Compliance with environmental permits is a requirement of the Project Hanford Management Contract. To assess this compliance, RL performed a surveillance of the Fluor Hanford, Inc. (FHI) management and implementation of State of Washington, Department of Ecology-issued State Waste Discharge Permit ST-4501 for the 400 Area FFTF.

Overall, the surveillance concludes that the documentation does demonstrate regulatory compliance with the Permit conditions and requirements. Good work practices were observed. These are identified in the enclosed surveillance report.

FHI employee, Mark E. Eby, examined and commented on a surveillance draft, for factual accuracy, before the report was finalized. Thank you for the helpful and courteous manner your staff displayed throughout the surveillance process.

OCT 11 2005

If you have questions, please contact me or your staff may contact Dave Evans, Deputy Assistant Manager for the River Corridor, on (509) 373-9278.

Sincerely,



Keith A. Klein
Manager

AMRC:DHC

Enclosure

cc w/encl:

D. M. Busche, FHI

S. V. Doeblor, FHI

M. E. Eby, FHI

R. H. Engelmann, FHI

L. L. Fritz, FHI

H. Hermanas, FHI

J. K. Perry, FHI

D. K. Smith, FHI

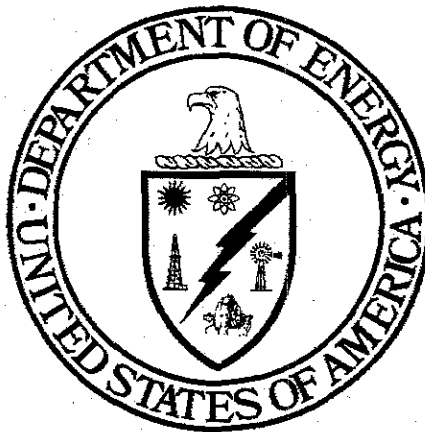
J. F. Williams, FHI

Administrative Record (files: State Waste

Discharge Permit ST-4501; FFTF)

Environmental Portal

**U.S. DEPARTMENT OF ENERGY
RICHLAND OPERATIONS OFFICE
SURVEILLANCE OF
STATE WASTE DISCHARGE PERMIT ST-4501
HANFORD SITE 400 AREA FAST FLUX TEST FACILITY (FFTF)
RICHLAND, WASHINGTON
S-05-AMRC-FHI-FFTF-002**



September 22, 2005

Performed by:

Douglas H. Chapin,
Fast Flux Test Facility Project
Surveillance Team Leader

Mary F. Jarvis
Environmental Services Division
Team Member

SURVEILLANCE REPORT S-05-AMRC-FHI-FFTF-002

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EXECUTIVE SUMMARY

Compliance with environmental permits is a requirement of the U.S. Department of Energy's Project Hanford Management Contract, currently with Fluor Hanford, Inc. (FHI). To assess this compliance, the U.S. Department of Energy, Richland Operations Office (RL) performed a surveillance of Fluor Hanford, Inc.'s (FHI) management and implementation of State of Washington Department of Ecology (Ecology)-issued State Waste Discharge Permit ST-4501 (Permit) for the 400 Area Industrial Process Wastewater Discharge System at the Fast Flux Test Facility (FFTF), located in the 400 Area of the Hanford Site.

On September 12, 2005, the RL surveillance team reviewed samples from two years of compliance records and all Permit-required deliverables to judge if the FHI-FFTF Contractor (Contractor) was able to demonstrate compliance with the conditions and limitations of ST-4501. Overall, the surveillance concluded that the documentation demonstrated regulatory compliance with the Permit conditions and requirements. The surveillance concluded there were no findings, issues, or observations; a good practice was identified.

The Contractor demonstrated from the documentation that the facility is run in compliance with the conditions and limitations of the Permit. The documentation is well organized, records are compliantly maintained, and facility personnel are knowledgeable of applicable laws, regulations, and Permit requirements, in particular as they apply to the facility. The Contractor interviewed (Mr. Mark E. Eby) was very helpful, knowledgeable, and well prepared.

1.0 Scope of Surveillance

The Project Hanford Management Contract Number DE-AC06-96-RL-13200, Part I-The Schedule, Section C, Statement of Work, C.5.1 Environment, Safety, Health and Quality Assurance, Subsection C. 5.1.1 Environmental Protection, "Requirements," states that "the Contractor shall manage assigned facilities and operable units to assure compliance with environmental permits, requirements, and agreements." To verify this compliance, the surveillance examined a sample of documents submitted to Ecology and DOE, as well as documents maintained to demonstrate compliance with the requirements of the State Waste Discharge Permit ST-4501. The surveillance was performed at the 400 Area Industrial Process Wastewater Discharge System at the FFTF on the Hanford Site on September 12, 2005.

ST-4501 was issued on September 18, 2003; it became effective on October 1, 2003, and expires October 1, 2008. A minimum of one regulatory inspection must be performed by Ecology during the five-year life of a State Waste Discharge Permit; FFTF has not yet been inspected since the permit was issued. Consequently, a regulatory inspection may occur at any time. If any problems are identified, it may result in a penalty or fine for DOE. The last Ecology inspections were performed on October 19, 2000, November 8,

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2000, and November 14, 2000. Ecology toured on August 25, 1999. As a result, RL decided it was prudent to perform surveillance at this time, to ascertain the facility's compliance status with the Permit's conditions and limitations.

To this end, the RL Surveillance Team followed the RL Integrated Management System (RIMS) procedure for performing RL Contractor surveillances. The initial step is to complete a "Surveillance Planning Form," which includes "Performance Expectations" or "lines of inquiry." These are in the form of questions, which are asked during the surveillance and documents, which will be requested of the Contractor during the conduct of the surveillance. The "Surveillance Planning Form" is sent to the Contractor in advance of the surveillance. For this surveillance, the planning form was sent to FFTF Contractor personnel on August 29, 2005. The Performance Expectations are drawn directly from the requirements of ST-4501.

According to RIMS procedure, after the draft surveillance report is complete, a copy is shared with the Contractors surveilled for them to review for factual accuracy. The Contractor comments are incorporated prior RL's formal issuance of the report.

2.0 Summary of Results

This section summarizes the surveillance by describing the activities the surveillors performed. The following activities are required by ST-4501, the surveillance team examined documentation that demonstrated compliance with these requirements. The surveillors asked the following questions, compiled the results, and formed conclusions:

Question 1. Review Sampling and Analysis Plan and compare to requirements. Was it submitted on time per Permit due date of December 31, 2003? Please provide a copy of submittal to Ecology. (Source Document: ST-4501)

Result: Done. The Sampling and Analysis Plan (SAP) was submitted on December 4, 2003. Contractors supplied RL a copy of the Ecology submittal. Ecology (Kathy Conaway) replied that the SAP met Ecology's expectations. Therefore, this Permit requirement is satisfied.

Question 2. Review three Discharge Monitoring Reports and compare to Permit requirements. For this surveillance, the following Discharge Monitoring Reports (DMRs) were chosen: February 16, 2004; 2nd Semiannual Report 2004; and 1st Semiannual Report 2005. Please provide copies of submittals to Ecology. (Source Document: ST-4501)

- **February 6, 2004.** Letter to K.A. Conaway (Ecology) from S.V.Doebler (FHI), *Discharge Monitoring Report for the State Waste Discharge Permit ST-4501-July - December Reporting Permit -2003*. FH-0400339. February 6, 2004.

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- **2nd Semiannual Report 2004.** Letter to K.A. Conaway (Ecology) from S.V.Doebler (FHI), *Discharge Monitoring Report for the State Waste Discharge Permit ST-4501-January –June Reporting Permit -2004.* FH-0402371. August 6, 2004.
- **1st Semiannual Report 2005.** Letter to K.A. Conaway (Ecology) from S.V.Doebler (FHI), *Discharge Monitoring Report for the State Waste Discharge Permit ST-4501-July-December Reporting Permit -2004.* FH-0500436. February 7, 2005.

Result: Done. The Discharge Monitoring Reports (DMRs) were reviewed to determine if the parameters required to be monitored for per the Permit were indeed tested and if the data were submitted. The DMRs were also checked to see if the analytical results were within the limits specified by the Permit. The water quality parameters are all monitored for automatically with on-line testing equipment. When compared to the requirements of the Permit, the DMRs were all judged to be correct. Therefore, this Permit requirement is satisfied.

A total of four DMRs have been submitted to Ecology during the lifecycle of the Permit. The Contractor provided a DMR which was not requested; it is:

- **2nd Semiannual Report 2005.** Letter to K.A. Conaway (Ecology) from S.V.Doebler (FHI), *Discharge Monitoring Report for the State Waste Discharge Permit ST-4501-January –June Reporting Permit -2005.* FH-0502309. August 2, 2005.

Question 3. Have there been any Noncompliance Notifications or Reports made on ST-4501 this permit cycle? Please provide copies. (Source Document: ST-4501)

Result: No, there have been no noncompliances, Off- Normal Reports, or Permit exceedences during this Permit cycle. However, there were two non-routine Ecology-approved discharges during the Permit cycle as noted in the DMRs. These are reported in the DMR transmittal letters dated August 6, 2004 and August 2, 2005. In both cases, Ecology provided advanced approval for these discharges via e-mail. Therefore, this Permit requirement is satisfied.

Question 4. Are records retained for a minimum of three years? Please demonstrate. (Source Document: ST-4501)

Result: Yes, The Contractor demonstrated compliance records extending back for three years. Therefore, this Permit requirement is being satisfied.

Question 5. Are measurement or sample results recorded per Permit requirements? Please demonstrate. (Source Document: ST-4501)

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Result: Yes, a review of DMRs demonstrated that data are reported according to the Permit requirements. The Contractor also demonstrated the on-line data management and storage system. Therefore, this Permit requirement is being satisfied.

Question 6. Please show us a copy of the Operations and Maintenance (O&M) Manual. Explain how you demonstrate that you review it annually. (Source Document: ST-4501)

Result: Done. The Contractor provided written notification to Ecology in the DMR that: "All of the reference manuals identified in the O&M Matrix had been reviewed and updated as required and are available for review." The annual notifications are provided in the transmittal letters to the DMRs dated August 6, 2004, and August 2, 2005. Therefore, this Permit requirement is satisfied.

Question 7. Does the facility have a Solid Waste Control Plan? Please provide copy, if applicable. (Source Document: ST-4501)

Result: No, there is no Solid Waste Control Plan for the facility. However, the subject is covered in: *Building Emergency Plan for FFTF Property Protection Area*, HNF-IP-0263-FFTF. Revision 10. K.A. Leonard, FHI. November 2003. Therefore, the Permit condition is being satisfied.

Question 8. Does the facility have a system to train operators to prevent, contain, and control spills? Please provide evidence, if applicable. (Source Document: ST-4501)

Result: Yes, facility personnel are trained according to the following document: *Dangerous Waste Control Plan, FFTF Project. Dangerous Waste Training Plan*. HNF-9229. Revision 2. October 26, 2004. Therefore, the Permit condition is being satisfied.

Question 9. Have open items from the previous inspection been closed? (Source Document: WAC Code)

Result: There have never been any open items from an inspection.

3.0 Surveillance Results

This section describes any findings, issues, observations, and good practices identified during the surveillance; there were no findings, issues, or observations identified during the surveillance. However, a good practice identified.

Good Practice or Strength

The Contractor (Mr. Mark E. Eby) was very well prepared for the surveillance. He did a good job of demonstrating compliance with the Permit, and is knowledgeable of applicable environmental regulations. He is very courteous, patient, and helpful in answering questions and supplying required reports and letters. The Contractor is well

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informed about the facility, the contents of the Permit, and supporting regulatory documents. The Contractor's files and records are in excellent order; he was able to retrieve records and demonstrate the on-line records system with ease, and did so immediately when requested.

RL Lead Assessor Closure Required: YES ☐ NO ☒

4.0 Conclusions

Based on this surveillance, it is the opinion of these surveillors, that the Contractor is doing an excellent job of implementing requirements and adhering to the conditions and limitations of ST-4501. The surveillance identified no areas, which need improvement. The Contractor is also to be commended for doing an excellent job in this area. The automated, on-line monitoring system is working well, and is a vast improvement over the sampling and analysis program required by the previous permit.